

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

MARK FULTZ, Individually,	)	CA No.: 2:21-cv-1863-BHH
	)	
Plaintiff,	)	
	)	
-versus-	)	<b>DEFENDANT'S LOCAL</b>
	)	<b>26.01 DISCLOSURES</b>
BROTHERS PROPERTY MANAGEMENT	)	
CORPORATION; PATRIOTS ANNEX,	)	
LLC; PATRIOTS POINT DEVELOPMENT	)	
AUTHORITY,	)	
Defendant.	)	
	)	

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- (A) **State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

**RESPONSE:**

None known at this time.

- (B) **As to each claim, state whether it should be tried jury or nonjury and why.**

**RESPONSE:**

The case should be tried nonjury as the Complaint seeks only equitable relief.

- (C) **State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

**RESPONSE:**

This Defendant is not a publicly owned company.

- (D) **State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

**RESPONSE:**

The facts and circumstances which give rise to this action arose in Charleston County which is within the Charleston Division.

- E) **Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason whole entail substantial duplication of labor if heard by different judges.**

**RESPONSE:**

No.

- (F) **If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

**RESPONSE:**

This Defendant is correctly identified.

- (G) **If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

**RESPONSE:**

None.

Dated this 18<sup>th</sup> day of June, 2021.

Respectfully submitted,

WALL TEMPLETON & HALDRUP, P.A.

s/Graham P. Powell

Graham P. Powell (Fed ID #7722)  
Stephanie G. Brown (Fed ID #123434)  
145 King Street  
Post Office Box 1200  
Charleston, South Carolina 29402  
Telephone: (843) 329-9500  
Graham.Powell@WallTempleton.com  
Stephanie.Brown@WallTempleton.com  
**Attorneys for Defendant Patriots Annex,  
LLC**